

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

**DuPont-Circleville  
800 DuPont Rd.  
Circleville, Ohio, 43113**

**ATTENTION:**

**Kathleen Kenyon  
Circleville Environmental Air**

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring DuPont-Circleville (DuPont or you) to submit certain information about the facility at 800 DuPont Rd. in Circleville, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within forty-five (45) calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

DuPont owns and operates an emission source at the Circleville, Ohio facility. We are requesting this information to determine whether your emission source is complying with the Ohio State Implementation Plan and applicable federal regulations.

DuPont must send all required information to:

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

DuPont must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

Failure to comply fully with this information request may subject DuPont to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Albana Bega at (312) 353-4789 or Dakota Prentice at (312) 886-6761.

6/6/16  
Date

Edward Nam  
Edward Nam  
Acting Director  
Air and Radiation Division

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Microsoft Excel Workbook format, and not in image format. If Microsoft Excel Workbook format is not

available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Microsoft Excel Workbook.

3. Provide submission on physical media such as compact disk, flash drive, or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

#### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.
3. The term "pollutant" includes but is not limited to any organic compounds, hazardous air pollutants, as well as any criteria pollutants and their precursors.

## Appendix B

### Information You Are Required to Submit to EPA

DuPont must submit the following information for its facility located at 800 DuPont Road, Circleville, Ohio ("the facility") pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), within forty-five (45) calendar days of its receipt of this letter:

1. Identify all owners and operators of the facility. For each entity, identify: whether the entity is an owner and/or operator; entity type (e.g., corporation, partnership, sole proprietorship, etc.); the entity's legal name; and all trade names or "doing business as" names used by the entity.
2. Provide a copy of each current air permit issued to DuPont by the Ohio Environmental Protection Agency (Ohio EPA), including, but not limited to, permit-to-install (PTI), permit-to-install and operate, and Part 70 (Title V) permit-to-operate.
3. Provide a copy of all permit applications submitted to Ohio EPA from May 2006 to the present. Also provide a copy of the original permit application for the current Title V Permit.
4. Provide a copy of all previous final permits issued by Ohio EPA to the facility from May 2006 to the present.
5. Provide a table of all emission tests conducted at the facility for any reason, from May 2006 to the present, and provide copies of all emissions test reports. Emissions testing includes, but is not limited to, compliance testing, engineering testing, ambient air monitoring testing (conducted at or near the facility), and testing for general information. Use the following guidelines for compiling the table and preparing copies of the stack test reports:
  - a. **Table:** Identify the emission unit, the control device, the date of the test, the federal or state regulation requiring the test (if applicable), pollutants tested, throughput during the test, and the test method(s) used. For each test during which the source was not operating at maximum design capacity, provide an explanation for why production was limited. State whether the report was shared with the Ohio EPA.
  - b. **Copies:** Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
6. Provide any and all documents related to any air risk assessment or air emission modeling conducted at the facility to determine the direction and extent of dispersion of any air pollutants being emitted from the facility. Include electronic copies of the methodology, input file (including building downwash inputs), meteorological data, and results.

7. Provide copies of any deviation, excess emissions reports, or startup, shutdown, and malfunction reports for the facility submitted to Ohio EPA or EPA from May 2011 to the present.
8. Provide copies of all quarterly reports, semi-annual compliance reports, or equivalent documents for the facility submitted to either Ohio EPA or EPA from May 2011 to the present.
9. Provide copies of all annual emissions reports submitted to Ohio EPA for the facility from May 2011 to the present, and include:
  - a. A narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used;
  - b. Any documents outlining procedures for calculating annual emissions; and
  - c. A table describing the assumed/estimated capture efficiencies for each control device(s) and the associated emission unit(s), including any associated documentation used in developing the capture efficiencies.
10. If you have conducted Method 9 visual emissions (opacity) readings from May 2011 to the present, provide all such readings. The records should state the emission unit, control device, or stack to which the readings apply. Abnormal emissions observations should be accompanied by records of the steps taken in response to the emissions.
11. Provide copies of all notifications and reports, pursuant to any National Emission Standards for Hazardous Air Pollutants applicable to the facility, submitted for the facility to either Ohio EPA or EPA under 40 C.F.R. Part 63, from May 2006 to the present, as well as the date on which the notifications or reports were prepared or submitted.
12. Provide all documents from the last five (5) years related to complaints, concerns, or claims by DuPont employees, government entities, other companies, or citizens related to, or alleged to be related to, any air emissions at the facility.
13. Provide all documents, related to all studies, inspections, or evaluations conducted or attempted for any reason from May 2006 to the present, of the air pollution control equipment and control systems at the facility, including, but not limited to:
  - a. System improvements implemented based on findings of any study, inspection, or evaluation;
  - b. Modeling emissions of air pollutants to the atmosphere;
  - c. Performance of the baghouse-ventilation-and-control system (including volumetric flow measurements and static pressure measurements); and
  - d. Commissioning reports.

14. Provide copies of all documents (including, but not limited to, reports, correspondence, memoranda, and phone discussion summaries) related to Prevention of Significant Deterioration, New Source Review, and New Source Performance Standards applicability for any projects undertaken at the facility from May 2006 to the present.
15. Provide the current projected capital outlay plan or any other document(s) that sets forth or identifies the operational or equipment changes or the projected capital expenditures that the facility will be making in the next five years (or any other planning period used) at the facility.
16. Provide a detailed narrative description for each process, reactor, or tank at the facility that is associated with production. The description should include but not be limited to the following:
  - a. A detailed map of the facility. The map should show clearly the location of each emission unit and air pollution control device contained in the current Part 70 Operating Permit Renewal (Title V Permit), issued on August 26, 2014 (Permit Number P0083843);
  - b. A process flow diagram that at a minimum illustrates the following:
    - i. Location of all process equipment, emission units, pollution control equipment, and emission points;
    - ii. Process flow of material handled/processed; and
    - iii. How the emissions are routed from each emission unit to each control device if present, or to the atmosphere.
  - c. Construction and start-up dates for each piece of equipment;
  - d. The design and current capacity of each piece of equipment;
  - e. A list of all air pollutants used and/or emitted from each process, reactor, or tank; and
  - f. A complete list and description of all air pollution control equipment. The description should include:
    - i. Each air pollution control device;
    - ii. Corresponding make and model;
    - iii. Corresponding design efficiency; and
    - iv. Parameters monitored to demonstrate continuous compliance.



17. For each thermal oxidizer (TO), provide the following information in a Microsoft Excel Workbook or compatible format, during the period from May 2011 to the present:
- a. Daily records showing the time, duration, and reason for by-passing the TO when associated emission units are in operation;
  - b. Records of any corrective action taken in response to a TO bypass;
  - c. Records of operating temperature in degrees Celsius and the 3-hrs rolling average temperature;
  - d. The minimum operating temperatures established for regulatory compliance, the method used to establish the values (reference performance test as applicable), and the effective date of these operating limits;
  - e. The corrective action taken for each deviation from minimum operating temperature;
  - f. Records of the calibration of the temperature monitor and recorder; and
  - g. Records of the quarterly and annual inspections of the control equipment.
18. For each wet scrubber, provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Continuous monitoring data of the pressure drop across the scrubber in inches of water column;
  - b. The pressure drop operating range, established for regulatory compliance, the method used to establish the values (reference performance test as applicable), and the effective date of these operating limits;
  - c. The corrective action taken for each deviation from the pressure drop operating range;
  - d. For equipment used to monitor the pressure drop, provide the following from May 2006 to the present:
    - i. The date of installation; and
    - ii. Calibration (or verification testing) records.
  - e. Continuous water flow rate data in gallons per minute.
  - f. The minimum scrubber liquid flow rate established for regulatory compliance, the method used to establish the values (reference performance test as applicable), and the effective date of these operating limits;

- g. The corrective action taken for each deviation from the minimum scrubber water flow rate;
  - h. For equipment used to monitor the water flow rate, provide the following from May 2006 to the present:
    - i. The date of installation; and
    - ii. Calibration (or verification testing) records.
  - i. The date, time, and duration of downtimes, including reason and the corrective action taken for each event; and
  - j. The date and hours of periods that the scrubber was not in operation but associated emission units were in operation.
19. For each bag collector and product collector (dust collector or baghouse), provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Parameters monitored to determine whether inspection, maintenance, or repair is needed. For each parameter provide set point or operating parameter limits, method used to establish each operating parameter limit (reference performance test as applicable), and effective date of the operating limits;
  - b. Records of the differential pressure readings taken;
  - c. Records of inlet volumetric flow rates taken;
  - d. Records of other parameters taken;
  - e. The date, time, and hours of downtimes, during which the process was in operation, including reasons and the corrective actions taken for each event;
  - f. Documentation of how emissions factors, including capture efficiencies, were derived and the maximum hourly emission rates used by the facility to determine emissions;
  - g. All inspection, maintenance, and repair logs; and
  - h. Dates of installation of all improvements and modifications.
20. For each of the volatile organic compounds (VOCs) continuous emission rate monitoring systems (CERMS), provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Continuous emissions in part per million (ppm);
  - b. 24-hour average emission rate in lbs/hr;

- c. 365-day rolling average emission rate in lbs/hr;
  - d. 12-month rolling emission rate in tons;
  - e. Results of quarterly cylinder gas audits;
  - f. Results of the relative accuracy test audit(s), including results in units of the applicable standard(s);
  - g. The date, time, and hours of downtimes, including reasons and the corrective actions taken for each event;
  - h. Records of malfunctions, calibration and adjustments, and repair or maintenance activities; and
  - i. Provide the quality assurance/quality control plan and the logbook dedicated to the VOCs CERMS.
21. For the natural gas-fired Power Boiler #4 (B004), provide in a Microsoft Excel Workbook or compatible format records of the amounts of fuel combusted on a monthly basis from May 2011 to the present.
22. Provide documentation showing how the facility demonstrated compliance with the emission limits specified in Condition 1.b.(1) and Condition 2.b.(1) of the Title V Permit, from May 2011 to the present.

**Kapton Casting Line 1 (P001) and Line 2 (P015)**

23. For the emission units P001 and P015, provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Monthly and annual (12-month rolling total) production;
  - b. Monthly and annual (12-month rolling total) hours of operation;
  - c. The date, time, and hours of downtimes, including reasons and the corrective actions taken for each event; and
  - d. The date, time, and hours of operation during a malfunction of the control equipment(s) and/or VOCs CERMS.

**SP Resin Production Facility, Line #1, #2 and #3 (P017 and P076)**

24. For each emission unit, provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Monthly and annual (12-month rolling total) production;
  - b. Monthly and annual (12-month rolling total) hours of operation;

- c. The date, time, and hours of downtimes, including reasons and the corrective actions taken for each event; and
  - d. The date, time, and hours of operation during a malfunction of the control equipment(s).
25. Provide documentation showing how the facility demonstrated continuous compliance with the emission limits specified in Condition 5.b.(1).a and Condition 9.b.(1).a of the Title V Permit, from May 2011 to the present.

**Kapton Semi-Works (P020)**

26. For the P020, provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Monthly and annual (12-month rolling total) production;
  - b. Monthly and annual (12-month rolling total) hours of operation;
  - c. The date, time, and hours of downtimes, including reasons and the corrective actions taken for each event; and
  - d. The date, time, and hours of operation during a malfunction of the control equipment(s).
27. Provide records related to the compliance method option selected by the facility to comply with Condition 6.b.(1).a of the Title V Permit, from May 2011 to the present.

**Kapton Solvent Recovery Columns Unit 1 (P024) and Unit 2 (P081)**

28. For the distillation column(s), provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Monthly and annual (12-month rolling total) production;
  - b. Monthly and annual (12-month rolling total) hours of operation;
  - c. The date, time, and hours of downtimes, including reasons and the corrective actions taken for each event; and
  - d. The date, time, and hours of operation during a malfunction of the control equipment(s).
29. Provide all documents related to the compliance method option selected by the facility to comply with Condition 7.b.(1).a and Condition 12.b.(1).a of the Title V Permit, from May 2011 to the present.

**Kapton Film Manufacturing Line 3 (P080)**

30. For the P080, provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Monthly and annual (12-month rolling total) production;
  - b. Monthly and annual (12-month rolling total) hours of operation;
  - c. The date, time, and hours of downtimes, including reasons and the corrective actions taken for each event; and
  - d. The date, time, and hours of operation during a malfunction of the control equipment(s).
31. Provide all documents related to the compliance method option selected by the facility to comply with Condition 11.b.(1).a. of the Title V Permit. Provide records required by the selected compliance option from May 2011 to the present.

**Kapton Plasma Treater Oven and TO (P082)**

32. For the P082 provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Monthly and annual (12-month rolling total) production;
  - b. Monthly and annual (12-month rolling total) hours of operation;
  - c. The date, time, and hours of downtimes, including reasons and the corrective actions taken for each event; and
  - d. The date, time, and hours of operation during a malfunction of the control equipment(s).
33. Provide all documents related to the compliance method option selected by the facility to comply with Condition 13.b.(1).a, Condition 13.b.(1).b, and Condition 13.b.(2).a of the Title V Permit. Provide records required by the selected compliance option from May 2011 to the present.

**Kapton Chemical Area (P084)**

34. Provide all documents related to the compliance method option selected by the facility to comply with Condition 14.b.(1).a, Condition 14.b.(1).b, and Condition 14.b.(1).c of the Title V Permit. Provide records required by the selected compliance option from May 2011 to the present.

### **Air Stripper (P099)**

35. For the P099, provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Monthly and annual (12-month rolling total) hours of operation;
  - b. Influent and effluent air and water sampling results conducted by DuPont in the last five (5) years; and
  - c. All documentation related to efforts regarding the investigation and implementation of efforts to reduce or eliminate vinylidene chloride or other contaminants from the waste water stream that require Process P099.
36. Describe where the air stripper air effluent is vented (if not already explained in response to Request Number 16 above).
37. Provide documentation showing how the facility demonstrated compliance with the emission limits specified in Condition 15.b.(1).a of the Title V Permit, from May 2011 to the present.

### **Tedlar Film Production Line (P100)**

38. For the P100, provide the following information in a Microsoft Excel Workbook or compatible format, during the period of May 2011 to the present:
- a. Company identification of each solvent used;
  - b. Solvent usage rate in pounds per month;
  - c. Cast production rate in pounds per month;
  - d. VOCs stack emissions in pounds and tons per month; and
  - e. Rolling 12-month summation of VOC emissions in tons.
39. Provide documentation showing how the facility demonstrated compliance with the emission limits specified in Condition 16.b.(1).a of the Title V Permit, from May 2011 to the present.

## **Appendix C**

### **Confidential Business and Personal Privacy Information**

#### **Assertion Requirements**

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

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40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

## **Determining Whether the Information is Entitled to Confidential Treatment**

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph, and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?



7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

### **Personal Privacy Information**

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.



CERTIFICATE OF MAILING

I, Kathy Jones, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

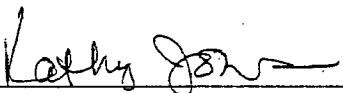
Kathleen Kenyon, Circleville Environmental Air  
800 DuPont Rd.  
Circleville, Ohio, 43113

I also certify that I sent a copy of the Request to Provide Information Pursuant to the

Clean Air Act by E-Mail to:

Robert Hodanbosi, Chief  
Division of Air Pollution Control, Ohio EPA  
P.O. Box 1049  
Columbus, OH 43216-1049  
[bob.hodanbosi@epa.ohio.gov](mailto:bob.hodanbosi@epa.ohio.gov)

On the 8th day of June 2016.

  
\_\_\_\_\_  
Kathy Jones, Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7014 2870 0001 9581 5004